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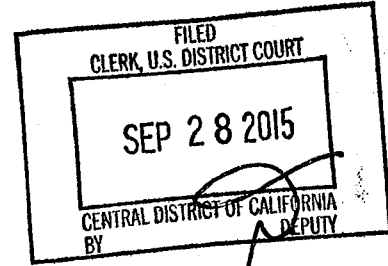
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

STEVE CHEN, USFIA, INC.,
ALLIANCE FINANCIAL GROUP,
INC., AMAUCTION, INC.,
ABORELL MGMT I, LLC,
ABORELL ADVISORS I, LLC,
ABORELL REIT II, LLC, AHOME
REAL ESTATE, LLC, ALLIANCE
NGN, INC., APOLLO REIT I, INC.,
APOLLO REIT II, LLC, AMKEY,
INC., US CHINA CONSULTATION
ASSOCIATION, and QUAIL RANCH
GOLF COURSE, LLC

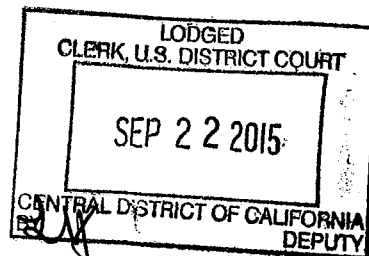
Defendants.

Case No.

CV 15-07425 RGK(GJS)

**PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S EX
PARTE APPLICATION TO FILE
PLAINTIFF'S APPLICATION FOR
A TEMPORARY RESTRAINING
ORDER UNDER SEAL UNDER
LOCAL RULE 79.5-1**

(FILED UNDER SEAL)



Plaintiff Securities and Exchange Commission ("SEC") hereby applies, *ex parte* and without notice, for an order temporarily sealing all papers filed today in support of the SEC's separately filed *ex parte* application for a temporary restraining order (the "TRO Application").

1 **Basis for filing under seal:** The SEC filed its TRO Application without notice
2 because this action concerns an ongoing offering fraud perpetrated by Defendants
3 Steven Chen, USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc., Aborell
4 Mgmt I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real Estate,
5 LLC, Alliance NGN, Inc., Apollo REIT I, Inc., Apollo REIT II, LLC, Amkey, Inc.,
6 US China Consultation Association, and Quail Ranch Golf Club, LLC. The SEC
7 believes there is an ongoing threat that the Defendants will continue to dissipate
8 assets and continue their fraudulent scheme if they were to be provided with notice of
9 the SEC's TRO application. Indeed, in the face of growing investor unrest, and
10 negative publicity in the press, Chen was interviewed by the Arcadia Police
11 Department on September 15, 2015, regarding his operation of USFIA. Immediately
12 after that interview, Chen attempted to wire \$7.5 million out of USFIA's bank
13 account at Bank of America to a bank in the Peoples Republic of China. The wire
14 was broken down into two parts, and \$3.5 million was sent abroad, while the
15 remainder is still held by the bank.

16 Because the SEC filed its TRO Application without notice, the SEC asks that
17 the Court file that application and its supporting papers under seal to ensure that the
18 TRO Application is not available to the public through PACER until the Court issues
19 its ruling. If posted on PACER, the TRO Application would be publicly available,
20 defeating the purpose of filing the TRO Application without notice and increasing the
21 likelihood that the Defendants will learn about the action before the Court issues its
22 ruling. If Defendants receive such notice, they may continue their fraudulent scheme
23 and continue to dissipate and misuse funds from new and existing investors, thus
24 placing the stolen funds beyond the reach of the Court.

25 **Duration of proposed sealing order:** The sealing order sought by this
26 application is of limited duration. The SEC only asks that the TRO Application be
27 sealed until two business days after the Court issues its decision on the SEC's TRO
28 Application. This will give the SEC sufficient time to execute the requested asset

1 freeze, to the extent that relief is granted.

2 **Proposed documents to be filed under seal:** With this application, the SEC
3 asks that the Court file the following pleadings under seal:

- 4 1. Complaint;
- 5 2. Ex Parte Application for a Temporary Restraining Order and an Order to
6 Show Cause Why a Preliminary Injunction Should Not Be Granted;
- 7 3. Memorandum of Points and Authorities Supporting the Ex Parte
8 Application for a Temporary Restraining Order and Order to Show
9 Cause Why a Preliminary Injunction Should Not Be Granted;
- 10 4. Declaration of Peter Del Greco.

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13 DATED: September 22, 2015

Respectfully submitted,

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15 /s/ Donald W. Searles

DONALD W. SEARLES

Attorney for Plaintiff

Securities and Exchange Commission
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